

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
TEXAS TYLER DIVISION**

**DEFENDANTS' NOTICE OF COMPLIANCE WITH DISCLOSURE OF PRELIMINARY  
ELECTION OF ASSERTED PRIOR ART REFERENCES**

In accordance with the Court’s Docket Control Order (Dkt. No. 488), Defendants Alcatel-Lucent USA Inc., Alcatel-Lucent Holdings Inc., Avaya Inc., Axis Communications AB, Axis Communications, Inc., Dell Inc., Hewlett-Packard Company, Juniper Networks, Inc., Polycom, Inc., ShoreTel, Inc., Sony Corporation, Sony Corporation of America, and Sony Electronics Inc. (collectively, “Defendants”) certify that they have served a copy of Defendants’ Preliminary Election of Asserted Prior Art References on Plaintiff Network-1 Technologies, Inc., and all counsel of record, by electronic mail on May 5, 2015.

Dated: May 11, 2015

Respectfully submitted,

/s/ Deron R. Dacus

Thomas M. Dunham  
(D.C. Bar No. 448407)  
Attorney-in-Charge  
J. Michael Woods  
(D.C. Bar No. 975433)  
Winston & Strawn LLP  
1700 K Street, NW  
Washington, DC 20006  
Telephone: (202) 282-5000  
Facsimile: (202) 282-5100  
Email: [tdunham@winston.com](mailto:tdunham@winston.com)  
Email: [mwoods@winston.com](mailto:mwoods@winston.com)

Deron R. Dacus  
Texas State Bar No. 00790553  
[ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)  
The Dacus Firm, P.C.  
821 ESE Loop 323, Suite 430  
Tyler, TX 75701  
Telephone: (903) 705-1117  
Facsimile: (903) 705-1117

**ATTORNEYS FOR DEFENDANT  
DELL, INC.**

/s/ Eric H. Findlay (with permission)

William F. Lee – Lead Attorney  
(MA SBN 291960)  
(admitted *pro hac vice*)  
WILMER CUTLER PICKERING HALE  
AND DORR LLP  
60 State Street Boston, MA 02109  
Telephone: (617) 526-6000  
Facsimile: (617) 526-5000  
Email: [william.lee@wilmerhale.com](mailto:william.lee@wilmerhale.com)

Mark D. Selwyn  
(CA SBN 244180)  
(admitted *pro hac vice*)  
Joseph F. Haag  
(CA SBN 248749)  
(admitted *pro hac vice*)

Craig E. Davis  
(CA SBN 221356)  
**WILMER CUTLER PICKERING HALE  
AND DORR LLP**  
950 Page Mill Road  
Palo Alto, CA 94304  
Telephone: (650) 858-6000  
Facsimile: (650) 858-6100  
Email: [mark.selwyn@wilmerhale.com](mailto:mark.selwyn@wilmerhale.com)  
Email: [joseph.haag@wilmerhale.com](mailto:joseph.haag@wilmerhale.com)  
Email: [craig.davis@wilmerhale.com](mailto:craig.davis@wilmerhale.com)

Eric H. Findlay  
(SBN 00789886)  
Brian Craft  
(SBN 04972020)  
**FINDLAY CRAFT, P.C.**  
102 North College Ave. Suite 900  
Tyler, TX 75702  
Telephone: (903) 534-1100  
Facsimile: (903) 534-1137  
Email: [efindlay@findlaycraft.com](mailto:efindlay@findlaycraft.com)  
Email: [bcraft@findlaycraft.com](mailto:bcraft@findlaycraft.com)

**ATTORNEYS FOR DEFENDANTS  
ALCATEL- LUCENT USA INC.,  
ALCATEL- LUCENT HOLDINGS  
INC., AND SHORETEL, INC.**

/s/ Deron R. Dacus (with permission)

Jeffrey D. Sanok (Admitted in E.D. Tex.)

Brian M. Koide (Admitted in E.D.Tex.)

CROWELL & MORING LLP 1001

Pennsylvania Avenue, N.W. Washington,  
DC 2004-2595

Telephone: (202) 624-2500

Facsimile: (202) 628-5116

Email: jsanok@crowell.com

Email: bkoide@crowell.com

Deron R. Dacus

State Bar No. 00790553

Shannon Dacus

State Bar No. 00791004

THE DACUS FIRM, P.C.

821 ESE Loop 323, Suite 430

Tyler, TX 75701

Telephone: (903) 705-1117

Facsimile: (903) 705-1117

Email: ddacus@dacusfirm.com

Email: sdacus@dacusfirm.com

**ATTORNEYS FOR DEFENDANT  
AVAYA INC.**

/s/ C. Gregory Gramenopoulos (with  
permission)

C. Gregory Gramenopoulos

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP

901 New York Avenue, NW Washington,  
D.C. 20001-4413

Telephone: (202) 408-4400

Facsimile: (202) 408-4400

c.gregory.gramenopoulos@finnegan.com

Elliot C. Cook

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP

Two Freedom Square

11955 Freedom Dr. Reston, VA 20190

Telephone: (202) 571-2700

Facsimile: (202) 408-4400

Email: elliot.cook@finnegan.com

**ATTORNEYS FOR DEFENDANTS,  
AXIS COMMUNICATIONS, INC. AND**



/s/ Jennifer H. Doon (with permission)

Jennifer H. Doan  
State Bar No. 08809050  
Alycia Curtis  
State Bar No. 24086385  
HALTOM & DOAN  
6500 Summerhill Road, Suite 100  
Texarkana, TX 75503  
Telephone: (903) 255-1000  
Facsimile: (903) 255-0800  
Email: jdoan@haltomdoan.com  
Email: acurtis@haltomdoan.com

Stephen D. Howen  
State Bar No. 10117800  
HALTOM & DOAN  
Preston Park Financial Center West  
4975 Preston Park Blvd., Suite 625  
Plano, TX 75093  
Telephone: (469) 814-0433  
Facsimile: (469) 814-0422  
Email: showen@haltomdoan.com

Robert J. Walters  
(DC Bar No. 463077)  
PAUL HASTINGS LLP  
875 15th Street, N.W. Washington, D.C.  
20005  
Telephone: (202) 551-1949  
Facsimile: (202) 551-0449  
Email: robertwalters@paulhastings.com

David H. Dolkas  
(CA Bar No. 111080)  
MCDERMOTT WILL & EMERY LLP  
275 Middlefield Road, Suite 100  
Menlo Park, CA 94025  
Telephone: (650) 815-7415  
Facsimile: (650) 815-7401  
Email: ddolkas@mwe.com

**ATTORNEYS FOR DEFENDANT  
HEWLETT PACKARD**

/s/ Alan M. Fisch (with permission)

Alan M. Fisch

[alan.fisch@fischllp.com](mailto:alan.fisch@fischllp.com)

Alicia M. Carney

[alicia.carney@fischllp.com](mailto:alicia.carney@fischllp.com)

FISCH SIGLER LLP

5335 Wisconsin Avenue, NW Eighth Floor

Washington, DC 20015

Tel: (202) 362-3500

**ATTORNEYS FOR DEFENDANT  
JUNIPER NETWORKS, INC.**

*/s/ James H. Hall (with permission)*

Susan K. Knoll

Lead Attorney

Texas State Bar No. 11616900

James H. Hall

Texas State Bar No. 24041040

WONG, CABELLO, LUTSCH,

RUTHERFORD & BRUCCULERI, LLP

20333 State Highway 249, Suite 600

Houston, Texas 77070

Telephone: (832) 446-2400

Facsimile: (832) 446-2424

E-Mail: [sknoll@counselip.com](mailto:sknoll@counselip.com)

E-Mail: [jhall@counselip.com](mailto:jhall@counselip.com)

**ATTORNEYS FOR DEFENDANT  
POLYCOM, INC.**

*/S/ Lionel M. Lavenue (with permission)*

Lionel M. Lavenue

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP

Two Freedom Square

11955 Freedom Drive

Reston, VA 20190-5675

Telephone: (571) 203-2700

Facsimile: (202) 408-4400

Email: [lionel.lavenue@finnegan.com](mailto:lionel.lavenue@finnegan.com)

**ATTORNEY FOR DEFENDANTS  
SONY CORPORATION, SONY  
CORPORATION OF AMERICA AND  
SONY ELECTRONICS INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service and are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 11, 2015.

*/s/ Deron R. Dacus*  
Deron R. Dacus